

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)

Amendment of Part 90 of the)
Commission's Rules To Provide)
for the Use of the 220-222 MHz Band)
by the Private Land Mobile)
Radio Service)

PR Docket No. 89-552

Implementation of Sections 3(n) and 332)
of the Communications Act)

GN Docket No. 93-252

Regulatory Treatment of Mobile Services)

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To: The Commission

REPLY COMMENTS OF SEA INC.

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September 27, 1995

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REPLY COMMENTS OF SEA INC.

SEA Inc. ("SEA"), by its undersigned counsel and pursuant to Section 1.415 of the Commission's Rules and Regulations, hereby files its reply comments in the above-captioned proceeding regarding the Commission's Fourth Notice of Proposed Rulemaking, FCC 95-381, released August 29, 1995 (4th NPRM), in which the Commission proposed rules whereby incumbent 220 MHz licensees will be permitted to modify their existing authorizations by changing their transmitter sites.

SEA has participated in developing 5 kHz narrowband technology for land mobile radio systems since 1981. SEA manufactures and markets narrowband linear modulation wireless equipment for voice and data operations in 5 kHz channels in the 220 MHz service. SEA has a full line of type-accepted narrowband mobile, base and portable radio products for the 220-222 MHz frequency band.

After reviewing the comments filed in this proceeding, SEA reiterates its support for the approach proposed in the Comments of the American Mobile Telecommunications Association, Inc. ("AMTA") in this proceeding, which would allow licensees to relocate their

facilities a maximum of one half the distance over 120 kilometers toward any co-channel licensee to a maximum of 35 kilometers.^{1/}

The AMTA proposal will result in reduced burdens and greater efficiency for Commission staff and licensees, while avoiding mutual exclusivity. The increased processing speed will facilitate Phase I modifications and permit earlier licensing of Phase II 220-222 MHz systems.

For these reasons, SEA urges the Commission to adopt the AMTA proposal to permit modifications resulting in relocation of Phase I facilities to one half the distance over 120 kilometers toward any co-channel licensee to a 35 kilometer maximum.

Respectfully submitted,

SEA Inc.

By:



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^{1/} See AMTA Comments at 10.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day of September, 1995, caused copies of the foregoing document to be served by first class mail, postage prepaid to the following:

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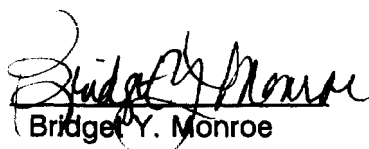
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